

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

IN RE: Constantine Georgopoulos and Maria  
E. Georgopoulos

CHAPTER 13  
CASE NO. 09-18518-JNF

OBJECTION TO DEBTORS' CHAPTER 13 PLAN

Now Comes Wells Fargo Bank, N.A. and files its objection to the Debtors' Chapter 13 Plan. In support of its objection, Wells Fargo Bank, N.A. states as follows:

1. Wells Fargo Bank, N.A. is the holder of the first mortgage on the debtors' property located 24 Shackford Road, Reading, MA.
2. The mortgage to Wells Fargo Bank, N.A. is in default with a pre-petition arrearage of \$23,724.66.
3. The debtors' Chapter 13 Plan fails to provide for the payment of any the pre-petition arrears owed to Wells Fargo Bank, N.A.

WHEREFORE, Wells Fargo Bank, N.A. respectfully requests that the Court deny confirmation of the debtors' Chapter 13 Plan or for such other relief as the Court deems just and proper.

Respectfully submitted,

/s/ Rian K. Vernon  
Rian K. Vernon, Esquire  
BBO# 662635  
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Dated: October 22, 2009

In Re: Constantine Georgopoulos and Maria E. Georgopoulos  
Case No. 09-18518-JNF  
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CERTIFICATE OF SERVICE

I, Rian K. Vernon, Esquire, state that on October 22, 2009, I electronically filed the foregoing Objection to Plan with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Office of the U.S. Trustee  
Carolyn Bankowski, Esq., Chapter 13 Trustee  
Herbert Weinberg, Esquire for the Debtors

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Rian K. Vernon  
\_\_\_\_\_  
Rian K. Vernon, Esquire  
BBO# 662635

Constantine Georgopoulos  
24 Shackford Road  
Reading, MA 01867

Maria E. Georgopoulos  
24 Shackford Road  
Reading, MA 01867

200909-1194/Georgopoulos, Constantine